

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
READING DIVISION**

In Re: HEATHER L. BLANKENBILLER, Debtor	Chapter 13 Bankruptcy Bankruptcy No. 18-10878 REF
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**STIPULATION BETWEEN DEBTOR AND CHAPTER 13 TRUSTEE
RE: PROCEEDS OF SALE OF RESIDENTIAL REAL ESTATE**

Debtor, by and through her counsel, George M. Lutz, Esquire and Hartman, Valeriano, Magovern & Lutz, P.C., and Frederick L. Reigle, Esquire, the Chapter 13 Trustee, hereby enter into this Stipulation Between Debtor and Chapter 13 Trustee re: Proceeds of Sale of Residential Real Estate, and in support thereof represent as follows:

1. Heather L. Blankenbiller is the Debtor in the above-captioned bankruptcy proceeding.
2. On February 8, 2018, the Debtor filed a Voluntary Petition under Chapter 13 of the United States Bankruptcy Code, said Petition being docketed to No. 18-10878 REF in the United States Bankruptcy Court for the Eastern District of Pennsylvania.
3. Frederick L. Reigle, Esquire is the duly appointed Chapter 13 Trustee for the above-captioned bankruptcy proceeding.
4. On June 14, 2018, the Debtor sold a portion of her residential real estate to New Life Bible Fellowship Church. The sale of the real estate was approved by Order of this Honorable Court dated May 15, 2018. See Docket No. 31.
5. The net proceeds of the aforesaid sale were \$14,573.75, which sum has been delivered to the Chapter 13 Trustee. In addition, as required by this Court's Order approving the sale, the HUD—1 Settlement Statement has been delivered to the Chapter 13 Trustee.
6. The Debtor has amended her exemptions to reflect the change in the nature of the real estate assets, and has claimed an exemption of \$13,100.00 in the proceeds of the sale.
7. The Debtor and the Chapter 13 Trustee have agreed that the proceeds delivered to the Chapter 13 Trustee are exempt funds, and request that this Honorable Court approve this

Stipulation permitting the Chapter 13 Trustee to remit said funds to the Debtor. This distribution will not be subject to the Trustee's expense.

WHEREFORE, the Debtor and the Chapter 13 Trustee respectfully request this Honorable Court to enter an Order, in the form attached to the face hereto, approving this Stipulation, and permitting the Chapter 13 Trustee to remit the sum of \$13,100.00, representing the net proceeds of the sale of a portion of the Debtor's residential real estate, to the Debtor.

Date: June 19, 2018

Respectfully, submitted,

Hartman, Valeriano, Magovern & Lutz, PC

by: /s/ George M. Lutz

**George M. Lutz, Esquire
1100 Berkshire Boulevard, Suite 301
Wyomissing, PA 19610
Pa. Attorney ID No.: 46437**

**Frederick L. Reigle, Esquire
Chapter 13 Trustee**

by: /s/ Rolando Ramos-Cardona

**Rolando Ramos-Cardona, Esquire
Staff Attorney
2901 St. Lawrence Avenue
POB 4010
Reading, PA 19606**

AND NOW, this day of June, 2018, the within Stipulation between the Debtor and the Chapter 13 Trustee is APPROVED, and the Chapter 13 Trustee is permitted to remit to the Debtor the sum of \$13,100.00, representing the exempted portion of the net proceeds of the sale of a portion of the Debtor's residential real estate. This distribution will not be subject to the Trustee's expense.

BY THE COURT

**Richard E. Fehling
Chief United States Bankruptcy Judge**